



INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY DATA

Project/Activity Name:	Clean Cities, Blue Ocean Activity (CCBO)
Amendment (Y/N):	No
Geographic Location(s) (Country/Region):	Global
Implementation Start/End:	2019-2024
Solicitation/Contract/Award Number:	TBD
Implementing Partner(s):	TBD
Tracking ID/link:	E3-19-03
Tracking ID/link of Related RCE/IEE (if any):	
Tracking ID/link of Other, Related Analyses:	

ORGANIZATIONAL/ADMINISTRATIVE DATA

Implementing Operating Unit(s): (e.g. Mission or Bureau or Office)	E3/Land and Urban
Funding Operating Unit(s): (e.g. Mission or Bureau or Office)	E3/Land and Urban
Funding Account(s):	
Funding Amount:	\$50 million
Amendment Funding Date:	Amendment Funding Amount:
Other Affected Unit(s):	
Lead BEO Bureau:	E3
Prepared by:	Moha Zahar
Date Prepared:	3/04/2019

ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type:	<input checked="" type="checkbox"/> Categorical Exclusion <input checked="" type="checkbox"/> Initial Environmental Examination <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Deferral
Environmental Determination(s):	<input checked="" type="checkbox"/> Negative Determination <input type="checkbox"/> Positive Determination
Initial Environmental Examination Expiration Date:	For five years from award or when there is a change in scope.
Additional Analyses/Reporting Required:	N/A
Climate Risks Identified (#):	Low <u>1</u> Moderate <u>1</u> High <u>0</u>
Climate Risks Addressed (#):	Low <u>1</u> Moderate <u>1</u> High <u>0</u>

THRESHOLD DECISION MEMO AND SUMMARY OF FINDINGS

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of activities described herein in the Clean Cities, Blue Ocean (CCBO) Task Order. This document makes a determination, per 22 CFR 216, and, as appropriate, identifies attendant conditions, for these activities. Upon final approval of this IEE, these recommended determinations are affirmed as 22 CFR 216 Threshold Decisions and Categorical Exclusions, and conditions become mandatory elements of its implementation. This IEE is a critical element of a mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

PROJECT/ACTIVITY SUMMARY

The objective of the CCBO Program is to improve human well-being and the environment by improving the effectiveness of waste management and 3R (reduce, reuse and recycle) systems in and around urban areas, particularly in riverine and coastal areas. Specifically, the program will build commitment and capacity of local and national governments and institutions to sustainably manage land-based waste for reducing ocean plastics, including country ownership. The program will have a global geographic focus and incorporate global cutting edge expertise, lessons learned, technology, and best practices of recycling and waste management. Furthermore, the program will adopt systems approach, engage the private sector, improve policies and implementation, and build consensus among different levels of government institutions, the public, and other key stakeholders. The following are four key objectives of the CCBO program:

Objective 1: Promote 3Rs and strengthen local and regional markets for recycled plastic.

Objective 2: Build social behavior change for sustainable waste management and recycling.

Objective 3: Increase capacity and effective governance of SWM and recycling systems.

Objective 4: Support for international fora, public-private partnerships, and multi-stakeholder alliances.

E3/LU envisioned the following interventions to be carried out under the CCBO program:

1) **Grants program** to support innovative and creative approaches in recycling and waste management. The grants program will prioritize awards that hold the most promise for reducing and preventing pollution of oceans from plastics. Grants may focus more broadly on management of the overall cities waste streams, but these efforts must plausibly demonstrate a critical, catalytic impact toward reducing marine plastics pollution. It is expected that the small grants will not include construction. Rather, grants will focus more on technical assistance, capacity building, training, public awareness, workshops, and some limited light equipment purchase to improve recycling, and waste management systems. However, if construction is included in one of the grantees workplan, an IEE will be required by the implementer for that specific grant to ensure compliance with USAID regulations. The implementer must assess the environmental risks and develop a mitigation plan before submitting to USAID for approval. If grantees interventions are within the discussed interventions in this section that are qualified for a Categorical Exclusion or Negative Impact, no additional IEE will be required and all the grants will be covered under this IEE.

2) **Evaluation of grants program results and documentation of lessons learned and best practices** to inform USAID future investments in this area. For this purpose, the implementer will develop and apply standardized tools to evaluate the effectiveness, scale-up potential, and sustainability of recycling and waste management approaches.

3) **Support and foster international cooperation on recycling and waste management.** Envisioned activities will support USAID engagement in national, regional, and international cooperative efforts in 3Rs and waste management. Interventions may include facilitation of regular communication between stakeholders and/or technical assistance to stakeholder organizations.

ENVIRONMENTAL DETERMINATIONS

Upon approval of this document, the determinations become affirmed, per Agency regulations (22CFR216).

TABLE 1: ENVIRONMENTAL DETERMINATIONS FOR RELEVANT PROJECT ACTIVITIES

Projects/Activities	Categorical Exclusion Citation (if applicable)	Negative Determination	Positive Determination	Deferral ¹
Task 1: Small grants	See table 1B			
Task 2: Evaluations	216.2 (c) (1) and 216.2(c)(2)			
Task 3: Foster international cooperation	216.2 (c) (1) and 216.2(c)(2)			

Overview of Relevant Project Activities under Funding Cycle	Categorical Exclusion Citation (if applicable)
1.Training of community and government officials	216.2©(2)(1) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.). This activity is not affected by climate change.
2.Technical assistance to facilitate dialogue between communities and government institutions	216.2©(2)(1) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.). This activity is not affected by climate change.
3.Monitoring and evaluation of interventions	216.2©(2)(1) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.). This activity is not affected by climate change.
4.Promote waste recycling through civic education and awareness campaigns	216.2©(2)(1) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.). This activity is not affected by climate change.
5.Assess environmental laws and regulations of cities and	Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the

¹ Deferrals must be cleared through an Amendment to this IEE prior to implementation of any deferred activities. USAID/IPs may utilize the Environmental Screening Tool to assess impacts of deferred activities.

provide technical assistance that aim at improving recycling and waste management systems	extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.) This activity is not affected by climate change
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CLIMATE RISK MANAGEMENT

The CCBO program aims to improve recycling and waste management by the mandated authorities to reduce and prevent plastic waste in the marine and land environments. Activities presented in this IEE are focused on training, capacity building, public awareness, behavior change, and documentation and dissemination of relevant best practices to improve recycling and waste management practices. The climate risks associated with the envisioned activities mentioned above are believed to be low due to the nature of the grant assistance-specifically aimed at behavior change, capacity building, public awareness and technical assistance to communities and government institutions to adopt best practices in recycling and waste management. The implementer will ensure climate risks and possible adaptation plans are included in training, capacity building, public awareness, and behavior change activities. Given the global scope of the CCBO, climate risks were analyzed based on expert opinion and previous experience.

Any activities under small grants that are deferred under this IEE will require an environmental impact assessment specific to such grant to be developed by the implementer, documenting the risks, impact, and mitigation plans before submitting to USAID for approval. In addition, work plans of the program will be shared with the E3 Bureau's Environmental Officer and Climate Integration Lead, and quarterly meetings will be organized to discuss the activities and address any environmental and CRM related issues that may arise.

BEO SPECIFIED CONDITIONS OF APPROVAL

Similar experiences have shown that the use of some technologies in waste recycling may pose health and safety risks including injuries and exposure to harmful chemicals. If such risks are included in the proposed interventions, E3/LU Office will ensure that the implementer takes into account appropriate training to mitigate such risks.

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Sections 3, 4, and 5 of the IEE and any BEO Specified Conditions of Approval.

USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: Clean Cities, Blue Ocean

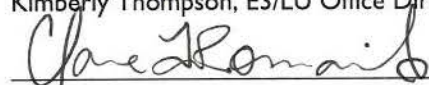
Approval:



Kimberly Thompson, E3/LU Office Director

4/4/2019
Date

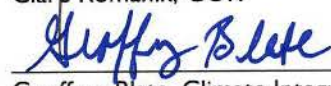
Clearance:



Clare Romanik, COR

4/4/2019
Date


Clearance:



Geoffrey Blate, Climate Integration Lead

4/4/2019
Date

Concurrence:



Teresa Bernhard, E3 Bureau Environmental Officer

4/6/19
Date

1.0 PROJECT/ACTIVITY DESCRIPTION

1.1 PURPOSE AND SCOPE OF IEE

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of the USAID intervention described herein and recommend determinations and, as appropriate, conditions, for these activities. Upon approval, these determinations become affirmed, per 22CFR216 and specified conditions become mandatory obligations of implementation. This IEE also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201mal).

This IEE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation. Potential environmental impacts should be addressed through formal environmental mitigation and monitoring plans (EMMPs) and/or Environmental Assessments (EAs), if needed.

1.2 PROJECT/ACTIVITY OVERVIEW

E3/LU is collaborating with several field missions and regional bureaus to develop innovative approaches that will reduce urban plastic waste and increase 3R (reduce, reuse and recycle) practices through the newly designed global Clean Cities, Blue Ocean program. The objective of this program is to build commitment and capacity of local and national governments and institutions to sustainably manage land-based waste for reducing ocean plastics, including country ownership. The program will have a global geographic focus and incorporate global cutting edge expertise, lessons learned, technology, and best practices of recycling and waste management. Specifically, the program will adopt a systems approach, engage the private sector, improve policies and implementation, and build consensus among different levels of government institutions, the public, and other key stakeholders to mitigate, reduce, and prevent ocean plastic.

To encourage creativity and innovation in addressing waste and recycling challenges, E3/LU selected a Statement of Objectives (SOO) for this procurement. The SOO requires the awardee to collaborate with and build the capacity of local governments, civil society organizations, and engage the private sector and other key stakeholders to identify resources and funding for relevant activities. Given the limited scope of the SOO in terms of detailing the interventions to be carried out by the grantees, E3/LU will ensure that the implementer takes into account environmental and climate risks assessments and comply with USAID regulations. These assessments will be approved by the BEO and E3/LU before implementation.

1.3 PROJECT/ACTIVITY DESCRIPTION

The goal of CCBO activity is to strengthen local systems and institutions so that they can effectively manage solid waste and 3Rs systems following the end of the activity. This includes working closely with governments, local organizations, and the private sector. For example, CCBO will work with various levels of local governments and other key stakeholders to: 1) increase revenue mobilization and explore financing options to expand and improve solid waste collection systems, treatment, and recycling; 2) discern and test appropriate waste treatment technologies so that they can put these in practice under

the program; and 3) build their capacity to better monitor, manage, and dispose of municipal solid waste, and promote recycling, including through inter-municipal cooperation. CCBO will also collaborate closely with local organizations through its small grants program and will work with/or create partnerships with the private sector to implement innovative and efficient technologies in waste management and recycling systems, including the export of U.S. environmental technologies. Together, these partnerships are expected to prepare multiple institutions and entities to carry on urban solid waste management and recycling activities when the program ends. Envisioned activities may include but not limited to:

(1) Research, policy dialogue, capacity-building, training, awareness-building campaigns, workshops, waste characterization surveys, beach clean-ups, and other similar activities. As appropriate, in the case of participants handling waste such as in waste characterization survey and beach clean-ups, the implementer, subcontractors, and grantees will incorporate training and information about health and safety, including the use of protective clothing - disposable or industrial durable gloves and, when and where needed, protective footwear, uniforms, and/or face masks. All training activities will include an appropriate tailored module on health and safety standards.

(2) Small equipment purchase for Materials Recovery Facilities (MRFs) and waste capture and collection. Such equipment is considered low tech recycling solutions and may include items such as weighting scales, weight bridge, sorting tables, conveyors systems, bottle perforators, and balling machines. The utilization of these low tech MRFs technologies may pose low to moderate health and safety risks including injuries and exposure to chemicals. Therefore, CCBO, implementing partners, and grantees will be required to develop: (i) health and safety training and measures, including protective clothing, appropriate footwear, gloves and masks, and (ii) safety equipment including fire extinguishers, ample lighting in the facility, roofed storage, and basic storm-water management. For more information on the equipment, please see the ADB list attached.

(3) Activities that require documentation that an EIA has been performed, per the required standard, although not by CCBO. This would include CCBO providing technical assistance to facilitate a larger investment in a facility requiring an EIA. An example would be developing a financing instrument for a waste-to-energy plant.

4)-Any other proposed activities by the selected implementer, including construction or selection of locations for waste bank/or recycling material facilities, If not in the above-mentioned categories, would require an IEE or EIA, to be developed by the implementer and approved by USAID.

Table 2: Defined or Illustrative Projects/Activities and Sub-Activities

Project/Activity 1 — Strengthen local and regional policies and regulations that support recycling and waste management.
Sub-activity 1.1 Assessments
1.2 Technical Assistance to country specific institutions
1.3 Small grants to local institutions
Project/Activity 2 — Promote sustainable waste management and recycling behaviors
Sub-activity 2.1 Assessments
2.2 Technical Assistance to country specific institutions
2.3 Small grants to local institutions
Project/Activity 3- Effective environmental governance of key government institutions
Sub-activity 3.1 Assessments

3.2 Technical Assistance to country specific institutions

3.3 Small grants to support the activities

Project/Activity 4 – Grant-making, support for international for-a, public-private partnerships, and multilateral alliances

Sub-activity 4.1 Assessments

4.2 Technical Assistance to country specific institutions

4.3 Small grants to local institutions

2.0 BASELINE ENVIRONMENTAL INFORMATION

2.1 LOCATIONS AFFECTED AND ENVIRONMENTAL CONTEXT (ENVIRONMENT, PHYSICAL, CLIMATE, SOCIAL)

Since the geographic focus of the activity is global and the specific interventions to be carried out under small grants mechanism are not known, an environmental impact assessment, consistent with 22 CFR 216, for any small grants that includes activities that are not covered under this IEE will be developed to reflect the environmental risks and a mitigation plan. The analysis and documentation will be tailored to each region/country selected under this program and submitted to E3 Bureau for approval and will include specific environmental context. Work plans will also be shared with the E3 Bureau's Environmental Officer and quarterly meetings will be organized to discuss any issues that may arise.

2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G. WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS

Since the geographic focus of the activity is global and the specific interventions are not known yet, this section will be revised to reflect detailed activities and geographic locations proposed by the implementer upon the approval of the implementer's selected approach. Work plans will also be shared with the Environmental Officer to ensure compliance.

2.3 COUNTRY/MINISTRY/MUNICIPALITY ENVIRONMENTAL CAPACITY ANALYSIS (AS APPROPRIATE)

Since the geographic focus of the activity is global and the specific interventions are not known yet, this section will be revised to reflect detailed activities and geographic locations proposed by the implementer upon the approval of the implementer's selected approach. Work plans will also be shared with the Environmental Officer to ensure compliance.

3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK²

Since the mechanism used for the design is a SOO, which limits the scope to the objectives, details of the risks will be developed based on the proposed interventions of the selected implementer and will require approval of E3/LU and the Environmental Officer. However, prior experiences have shown that the use of some technologies in waste recycling may pose health and safety risks including injuries and exposure to harmful chemicals. If such risks are included in the proposed interventions, E3/LU Office will ensure that the implementer takes into account appropriate training to mitigate such risks.

PROJECT/ACTIVITY 1: STRENGTHEN LOCAL AND REGIONAL POLICIES AND REGULATIONS THAT SUPPORT RECYCLING AND WASTE MANAGEMENT.

Potential adverse environmental and social impacts for the project/activity are unlikely because the activities described do not directly, indirectly or cumulatively have adverse impacts. Environmental Threshold Decisions and analysis are deferred for grants.

TABLE 3A. POTENTIAL IMPACTS – PROJECT/ACTIVITY 1

² Includes analysis of environmental and social

Project/Activity	Potential environmental and social impacts
Project/Activity 1: Strengthen local policies and regulations that support effective recycling and waste management	Adverse environmental and social impact is unlikely
Sub-activity 1.1: Technical Assistance/field assessments which does not have a direct, indirect or cumulative adverse environmental impact	Adverse environmental and social impact is unlikely
Sub-activity 1.2 Training and workshops that aims at improving policies and regulations pertaining to recycling and waste management which do not have a direct, indirect or cumulative adverse environmental impact	Adverse environmental and social impact is unlikely
Sub-activity 1.3 Workshops and training to facilitate implementation of policies and regulations	Adverse environmental and social impact is unlikely

PROJECT/ACTIVITY 2: PROMOTE SUSTAINABLE WASTE MANAGEMENT AND RECYCLING BEHAVIORS

TABLE 3B. POTENTIAL IMPACTS – PROJECT/ACTIVITY 2

Project/Activity	Potential environmental and social impacts
Project/Activity 2: Promote recycling and waste management behaviors through messaging, training, workshops	Adverse environmental and social impact is unlikely
Sub-activity 2.1: Field/capacity assessments, studies relevant to effective messaging within each context	Adverse environmental and social impact is unlikely
Sub-activity 2.2: Technical Assistance, capacity building	Adverse environmental and social impact is unlikely
Sub-activity 2.3: Public awareness campaigns for youth, women, and members of the informal recycling/waste management sector	Adverse environmental and social impact is unlikely

PROJECT/ACTIVITY 3: EFFECTIVE ENVIRONMENTAL GOVERNANCE OF KEY GOVERNMENT INSTITUTIONS

Project/Activity	Potential environmental and social impacts
Project/Activity3: Assessments of government institutions waste recycling systems	Adverse environmental and social impact is unlikely
Sub-activity 3.1: Capacity building	Adverse environmental and social impact is unlikely
Sub-activity 3.2: Training, workshops	Adverse environmental and social impact is unlikely. However, topics on health and safety standards will be incorporated into training, capacity building, and behavior change activities.
Sub-activity 3.3: Study tours	Adverse environmental and social impact is unlikely
Sub-activity 3.4: Small equipment purchase	Adverse environmental and social impact is unlikely. However, training and information on health and safety standards will be incorporated.

PROJECT/ACTIVITY 4: GRANT-MAKING, SUPPORT FOR INTERNATIONAL FOR-A, PUBLIC-PRIVATE PARTNERSHIPS, AND MULTILATERAL ALLIANCES

Project/Activity	Potential environmental and social impacts
Project/Activity 4: Small grants mechanism	Because the nature of the small grants is unknown, identifying adverse environmental and social impacts is not yet possible. Any activity that may pose an environmental risk will require an environmental impact assessment, consistent with 22 CFR 216, for such grant and submitted to the E3 Bureau for approval.
Sub-activity 4.1: Field Assessments	Because the nature of the small grants is unknown, identifying adverse environmental and social impacts is not yet possible. Any activity that may pose an environmental risk will require an environmental impact assessment, consistent with 22 CFR 216, for such grant and submitted to the E3 Bureau for approval.
Sub-activity 4.2: Capacity building	Adverse environmental and social impact is unlikely.
Sub-activity 4.3: Technical assistance	Because the nature of the small grants is unknown, identifying adverse environmental and social impacts is not yet possible. The envisioned activities include training, workshops, awareness campaigns, exchange visits, and building partnerships. Any activity that may pose an environmental risk will require an environmental impact assessment, consistent with 22 CFR 216, for such grant and submitted to the E3 Bureau for approval.

4.0 ENVIRONMENTAL DETERMINATIONS

4.1 RECOMMENDED ENVIRONMENTAL DETERMINATIONS

The following table summarizes the recommended determinations based on the environmental analysis conducted. Upon approval, these determinations become affirmed, per 22CFR216. Specified conditions, detailed in Section 5, become mandatory obligations of implementation, per ADS 204.

TABLE 4: ENVIRONMENTAL DETERMINATIONS

Projects/Activities	Categorical Exclusion Citation (if applicable)	Negative Determination with conditions	Positive Determination	Deferral³
Project/Activity 1: Support policies and regulations	X 2(v)			
Sub-Activity 1.1: Assessments	X 2(v)			
Sub-Activity 1.2: Technical Assistance	X 2(v)			
Sub-Activity 1.3: training, workshops		X		
Project/Activity 2: Promote social behavior	X 2(v)			
Sub-Activity 2.1: Assessments	X 2(v)			
Sub-Activity 2.2: Technical Assistance, training, workshops		X		
Project/Activity 3: Capacity building of government institutions		X		
Sub-Activity 3.1: Assessments		X		
Sub-Activity 3.2: Technical Assistance		X		
Sub-Activity 3.3: Training, workshops				
Project/Activity 4: Grants-Making				
Sub-Activity 4.1: small grants				X
Sub-Activity 4.2: Technical Assistance				X
Sub-Activity 4.3 Monitoring, evaluations and dissemination of best practices	X 2(v)			

³ Deferrals must be cleared through an Amendment to this IEE prior to implementation of any deferred activities. USAID/IPs may utilize the Environmental Screening Tool to assess impacts of deferred activities.

4.2 CLIMATE RISK MANAGEMENT

Overall, the envisioned activities under the CCBO program aim to improve 3Rs and waste management by the mandated authorities to reduce and prevent plastic waste in the marine and land environments. Activities presented under this IEE are focused on training, public awareness, capacity building, behavior change, and documentation and dissemination of relevant best practices to improve recycling and waste management practices. The climate risks associated with the envisioned activities mentioned above are believed to be low due to the nature of the grant assistance—specifically aimed at behavior change, capacity building, and technical assistance to communities and government institutions to adopt best practices in recycling and waste management. The implementer will ensure climate risks and possible adaptation plans are included in training, capacity building, public awareness, and behavior change activities.

Any activities under small grants that are deferred under this IEE will require an environmental impact assessment specific to such grant to be developed by the implementer, documenting the risks, impact and mitigation plan before submitting to USAID for approval. In addition, work plans of the program will be shared with the E3 Bureau's Environmental Officer and Climate Integration Lead, and quarterly meetings will be organized to discuss the activities and address any issues that may arise.

BEO SPECIFIED CONDITIONS OF APPROVAL

Similar experiences have shown that the use of some technologies in waste recycling may pose health and safety risks including injuries and exposure to harmful chemicals. If such risks are included in the proposed interventions, E3/LU Office will ensure that the implementer takes into account appropriate training to mitigate such risks.

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Sections 3, 4, and 5 of the IEE and any BEO Specified Conditions of Approval.

TABLE 5. ACTIVITY CLIMATE RISK MANAGEMENT SUMMARY TABLE

Tasks/ /Defined or Illustrative Interventions	Climate Risks	Risk Rating	How Risks are Addressed at Project Level	Opportunities to Strengthen Climate Resilience
<p>Task 1 – Assessments</p> <p>Illustrative interventions under this activity may include field assessments, workshops, training to facilitate policy dialog on waste management and recycling systems.</p>	None	N/A	N/A	Where applicable, assessments could include a component that examines if climate change impacted project results or program implementation in the urban sectors.
<p>Task 2 – Technical Assistance</p> <p>Illustrative interventions under this activity may include field assessments, workshops, training to facilitate policy dialog on waste management and recycling systems.</p>	None	N/A	N/A	Where applicable, research can consider the impacts of climate change and climate resilience on approaches and interventions in the recycling and waste management sector.

Tasks/ /Defined or Illustrative Interventions	Climate Risks	Risk Rating	How Risks are Addressed at Project Level	Opportunities to Strengthen Climate Resilience
<p>Task 3 – Grants making</p> <p>Illustrative interventions under this task may include small grants to promote recycling and waste management behaviors through public awareness, training, workshops; and support small scale recycling and sorting facilities.</p>	<p>Common climate risks that can affect the activities under grants include 1) increased rainfall, causing flooding which could affect the waste treatment (recycling, landfilling, storage) facilities and have the ability to transport solid and liquid wastes outside drainage systems and sanitation canals; 2) heat and possible drought, which could harm ecological systems and bring periodically increased disease vectors; and 3) sea level rise. <i>damage to waste facilities</i></p> <p>This section may be revised to reflect specific climate risks tailored to any activity not covered by this IEE</p>	<p>Low <i>Moderate</i></p>	<p>Where applicable, small grants will take into account climate risks in the design of the grants to ensure minimal impacts to the small grants activities and results.</p>	<p>Where applicable, small grants will include capacity building to mitigate the risks associated with natural disasters.</p>

5.0 LIMITATIONS OF THIS INITIAL ENVIRONMENTAL EXAMINATION

The determinations recommended in this document apply only to projects/activities and sub-activities described herein. Other projects/activities that may arise must be documented in either a separate IEE, an IEE amendment if the activities are within the same project/activity or other type of environmental compliance document and shall be subject to an environmental analysis within the appropriate documents listed above.

Other than projects/activities determined to have a Positive Threshold Decision, it is confirmed that the projects/activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22CFR216.2(d). In addition, other than projects/activities determined to have a Positive Threshold Decision and/or a pesticide management plan (PERSUAP), it is confirmed that the projects/activities described herein do not involve any actions listed below. Any of the following actions would require additional environmental analyses and environmental determinations:

- Support project preparation, project feasibility studies, or engineering design for activities listed in §216.2(d)(1);
- Affect endangered and threatened species or their critical habitats per §216.5, FAA 118, FAA 119;
- Provide support to extractive industries (e.g. mining and quarrying) per FAA 117;
- Promote timber harvesting per FAA 117 and 118;
- Lead to new construction, reconstruction, rehabilitation, or renovation work per §216.2(b)(1);
- Support agro-processing or industrial enterprises per §216.1(b)(4);
- Provide support for regulatory permitting per §216.1(b)(2);
- Lead to privatization of industrial facilities or infrastructure with heavily polluted property per §216.1(b)(4);
- Procure or use genetically engineered organisms per §216.1(b)(1); and/or
- Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials. Pesticides cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act per §216.2(e) and §216.3(b).

Grants are deferred until such time as sufficient information for meaningful environmental analysis.

Therefore, prior to committing any funds towards grants, a Threshold Determination must be completed consistent with 22 CR 216. The COR will submit these supplemental analyses to the E3 BEO for clearance. Further, work-plans will be submitted to the E3 BEO, prior to acceptance by the COR, to ensure consistency with the scope defined in this document.

7.0 REVISIONS

Per 22CFR216.3 (a) (9), when ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, this IEE will be amended to cover the changes. Per ADS 204, it is the responsibility of the USAID A/COR to keep the MEO/REA and BEO informed of any new information or changes in the activity that might require revision of this environmental analysis and environmental determination.